

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DISTRICT

CASE NO.: 6:11-bk-09917-KSJ

In re:

FREDERICK KELLEY PLUMMER,  
and BETTY ANN PLUMMER,

**FILED**

SEP 26 2011

Chapter 7

Debtors.

CLERK, U.S. BANKRUPTCY  
ORLANDO DIVISION

OBJECTION TO VERIFIED MOTION FOR REDEMPTION OF COLLATERAL

The secured creditor, William Hickey, hereby objects to the Verified Motion for Redemption of Collateral, Secured by William Hickey Pursuant to 11 U.S.C. 722 on the following grounds:

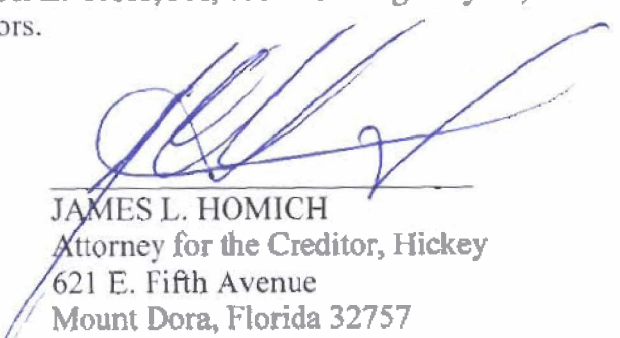
1. The value placed on the vehicle is significantly lower than similar vehicles currently on the market and established by Kelly Blue Book pricing guide. The current value of the vehicle if it is a V-6 in good condition according to Kelly Blue Book is \$6,100.00. A copy of the search result is attached as an Exhibit and incorporated in this Motion.

2. The undersigned attorney who filed his notice of appearance in this matter was not served with the Verified Motion.

3. This objection is being timely filed within the 21 day time period (although stated as 20 days in the motion) set forth in Local Rule 2002-4(b)(4) after service by mail.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Appearance has been furnished by U.S. Mail, U.S. Mail, postage pre-paid and/or by electronic transmission on September 23, 2011, to: United States Trustee-ORL7, 135 W. Central Blvd., Suite 620, Orlando, FL 32801; Chapter 7, Trustee, Arvind Mahendra, 5703 Red Bug Lake Rd., Suite 284, Winter Springs, FL 32708; The Law Office of Joel L. Gross, PA, 655 West Highway 50, Suite 101, Clermont, FL 34711, Attorney for Debtors.



JAMES L. HOMICH  
Attorney for the Creditor, Hickey  
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Fla. Bar No. 898848

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